

### **REMARKS**

In response to the Office Action mailed May 29, 2008, Applicants respectfully request reconsideration. All of the issues raised in the Office Action have been carefully considered and are addressed herein.

Claims 1-7, 9-20, 22 are pending in this application, claims 9-17, 19-20, and 22 being withdrawn from consideration. In this paper, claims 1-5 have been amended to better define Applicants' contribution to the art and new claims 24-26 have been added. No new matter has been introduced.

In view of the above amendments and following remarks, the pending application is believed to be in condition for allowance.

#### **I. Objections to Title**

The Office action objected to the title of the invention as being insufficiently descriptive. Applicants have provided a more descriptive title herein and respectfully request the objection be withdrawn.

#### **II. Rejections Under 35 U.S.C. §102**

The Office Action rejected claims 1-7 and 18 under 35 U.S.C. 102(e) as purportedly anticipated by U.S. Patent No. 7,208,881 ("Young"). Applicants respectfully traverse these rejections, to the extent they are maintained over these claims, as amended.

#### **Independent Claim 1**

Claim 1, as amended, recites an integrated lighting module, including "a drive and control system for receiving the ~~one~~ optical and thermal feedback signals from the feedback system, and controlling the one or more light-emitting elements based on predetermined control parameters and the optical and thermal feedback signals." Young simply does not teach or suggest such a drive and control system. Rather, as illustrated in FIG. 2 and disclosed in the accompanying text of the specification, control (47) of the light-emitting elements in Young is based solely on the optical feedback signals (48). Young relies exclusively on the thermoelectric device controller (40) to control the temperature of the light-emitting elements, and does not teach that the operation of the light-emitting elements is based on the temperature measurements (46). For at least this reason, claim 1 patentably distinguishes over Young, and it is respectfully requested that the rejection of this independent claim be withdrawn.

Dependent Claims 2-7 and 18

Each of claims 2-7 and 18 depends from independent claim 1 and patentably distinguishes over Young for at least the same reason as claim 1. Accordingly, it is respectfully requested that the rejection each of these dependent claims be withdrawn.

In addition, with regard to amended claim 2, upon which claims 3-5 and 7 depend, Young fails to teach a passive thermal management system that includes heat pipes with evaporator ends that are thermally coupled to the light-emitting elements. As noted above, Young relies exclusively on the thermoelectric device controller (40) to control the temperature of the light-emitting elements. As such, Young's system requires active thermal devices that can be controlled by the controller (40). By controlling the operation of the light-emitting devices based on thermal feedback, the applicants are able to use a less costly passive thermal management system than the active system required by Young.

Also, with regard to claim 18, Young does not teach mounting the drive and control system onto the same substrate as the light-emitting elements. In Young's FIG. 2, the control elements are illustrated as being remote from the thermoelectric structure, and in Young's FIG. 3, the LEDs 54 are mounted on the vertical arrangement of substrates, whereas the driving circuitry 51 is apparently mounted on a horizontal substrate.

Applicants believe that it is unnecessary at this time to argue the allowability of each of the dependent claims individually, aside from the remarks provided above. However, Applicants do not necessarily concur with the interpretation of the dependent claims as set forth in the Office Action, nor do Applicants concur that the bases for the rejection of any of the dependent claims is proper. Therefore, Applicants reserve the right to specifically address the patentability of the dependent claims in the future if deemed necessary.

Withdrawn dependent Claims 9-17, 19-20, and 22

Because claims 9-17, 19-20, and 22 are dependent upon claim 1, which Applicants believe to be in condition for allowance, Applicants respectfully request that these claims be reinstated in this application, and allowed based on this allowable claim, per MPEP 821.04(a):

"Where restriction was required between independent or distinct products, or between independent or distinct processes, and all claims directed to an elected invention are allowable, any restriction requirement between the elected invention and any nonelected invention that depends from or otherwise requires all the limitations of an allowable claim should be withdrawn."

**CONCLUSION**

It is respectfully believed that all of the rejections, objections, or comments set forth in the Office Action have been addressed. However, the absence of a reply to a specific rejection, objection, or comment set forth in the Office Action does not signify agreement with or concession of that rejection, objection, or comment. In addition, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Furthermore, nothing in this paper should be construed as an intent to concede any issue with regard to any claim.

In view of the foregoing amendments and remarks, this application should now be in condition for allowance. A notice to this effect is respectfully requested. If the Examiner believes, after this amendment, that the application is not in condition for allowance, the Examiner is requested to call the Applicants' representative at the telephone number indicated below to discuss any outstanding issues relating to the allowability of the application.

If this response is not considered timely filed and if a request for an extension of time is otherwise absent, Applicants hereby request any necessary extension of time. If there is a fee occasioned by this response, including an extension fee, please charge any deficiency to Deposit Account No. 14/1270.

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Respectfully submitted,



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